

Tuesday, December 16, 2025 at 11:32:42 PM Eastern Standard Time

Subject: Re: 45136-0001 Re: Defendants' Position on Motion for Leave to File Reply
Date: Tuesday, December 16, 2025 at 11:31:02 PM Eastern Standard Time
From: Brandon Davis (1312)
To: Jim Knoepp, Molly McDiarmid
CC: Dawson Morton, Brandon Davis (1312)

Good evening, Jim:

I am not able to respond to this tonight at this late hour. If you decide to move forward, please attach this communication thread so the court is apprised of our communications. Thank you.

Thank you.

From: Jim Knoepp <jim@dawsonmorton.com>
Sent: Tuesday, December 16, 2025 9:51 PM
To: Brandon Davis (1312) <Brandon.Davis@phelps.com>; Molly McDiarmid <Molly.McDiarmid@phelps.com>
Cc: Dawson Morton <dawson@dawsonmorton.com>
Subject: Re: 45136-0001 Re: Defendants' Position on Motion for Leave to File Reply

Attached is the motion for leave to file a reply. It and the reply brief will be filed tonight so please let me know if you consent or don't consent or are not in a position to respond before filing.

Thanks.

From: "Brandon Davis (1312)" <Brandon.Davis@phelps.com>
Date: Tuesday, December 16, 2025 at 10:48 PM
To: Jim Knoepp <jim@dawsonmorton.com>, Molly McDiarmid <Molly.McDiarmid@phelps.com>
Cc: Dawson Morton <dawson@dawsonmorton.com>, "Brandon Davis (1312)" <Brandon.Davis@phelps.com>
Subject: 45136-0001 Re: Defendants' Position on Motion for Leave to File Reply

Good evening, Jim:

Please send us the draft pleading or explain the essence and I'll work to answer you before I return to America tomorrow. If I cannot respond tomorrow, then we will respond by Friday at noon.

From: Jim Knoepp <jim@dawsonmorton.com>
Sent: Tuesday, December 16, 2025 7:49 PM
To: Molly McDiarmid <Molly.McDiarmid@phelps.com>; Brandon Davis (1312) <Brandon.Davis@phelps.com>
Cc: Dawson Morton <dawson@dawsonmorton.com>
Subject: Defendants' Position on Motion for Leave to File Reply

Counsel—

Can you please provide me your position on Plaintiffs' Motion for Leave to File a Reply brief regarding the FLSA collective action motion? I apologize for not having asked you earlier.

Thanks.

Jim Knoepp
jim@dawsonmorton.com
828-379-3169